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12 Attorneys for Defendants

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ERLING OLMERO LOPEZ POLANCO,)
16 Plaintiff,) Case No. 2:15-cv-01234-JCM-VCF
17)
18 v.)
19 LORETTA E. LYNCH, et al.,)
20 Defendants.)

21 **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

22 (First Request)

23 Defendants, by and through their attorneys, request a thirty day extension of time to file an
24 appropriate pleading to Plaintiff's complaint. In support of this motion, Defendants state as follows:
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1 1. On June 30, 2015, Plaintiff filed the above-caption Complaint, (ECF No. 1), seeking review
2 under the Administrative Procedure Act of U.S. Citizenship and Immigration Services' ("USCIS") denial
3 of Plaintiff's Petition for U Nonimmigrant Status.

4 2. Defendants have worked diligently to gather information to respond to the Complaint. On
5 August 28, 2015, undersigned counsel received a copy of the 673-page certified administrative record of
6 the adjudication of Plaintiff's Petition, and has been working with agency counsel to prepare an
7 appropriate response to the Complaint.

8 3. Defendants request the extension because, although they have worked diligently to gather
9 information to respond to Plaintiff's allegations, Defendants need additional time to provide a complete
10 and thorough response.

11 4. This request is made in good faith and not for purposes of delay, and will not prejudice
12 Plaintiff.

13 5. This is Defendants' first request for an extension of time to file an appropriate pleading in
14 response to the Complaint.

15 6. On August 28, 2015, undersigned counsel contacted Seth L. Reszko, counsel for Plaintiff,
16 about this motion, and was informed that Plaintiff does not oppose this thirty day extension of time.

17 Defendants therefore respectfully request the Court to grant a thirty day extension of time to file an
18 appropriate pleading to respond to Plaintiff's Complaint, up to and including Wednesday, September 30,
19 2015.

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1 Respectfully submitted this 31st day of August 2015.

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3
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/s/ *Troy D. Liggett* _____
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11 IT IS SO ORDERED:
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14 _____
15 UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE
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17 DATE: August 31, 2015
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PROOF OF SERVICE

I, Troy D. Liggett, certify that the following person was served with a copy of **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, stated below:

CM/ECF Notice

Seth L. Rezko
3365 Pepper Lane
Suite 102
Las Vegas, NV 89120
702-727-7777
atharilaw@earthlink.net

Attorney for Plaintiff

Dated this 31st day of August 2015.

/s/ Troy D. Liggett
TROY D. LIGGETT
Trial Attorney
District Court Section
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